

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

JENAM TECH, LLC,  
Plaintiff,

V.

GOOGLE LLC,  
Defendant.



CIVIL ACTION No. 6:20-cv-00453-ADA

## JURY TRIAL DEMANDED

**DECLARATION OF JANA IYENGAR IN SUPPORT OF DEFENDANT GOOGLE  
LLC’S OPPOSED MOTION TO TRANSFER VENUE**

I, Jana Iyengar, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called to testify as a witness, could and would competently do so under oath.
2. I am currently employed at Fastly, Inc., a cloud computing company headquartered in San Francisco, California, and I currently reside in Mountain View, California.
3. I was previously employed by Google LLC (“Google”) in its Mountain View headquarters from 2013 to 2018, as a software engineer. While at Google, I worked on Google’s implementation of the QUIC protocol. I am no longer employed by Google in any capacity.
4. I am currently involved with the Internet Engineering Task Force (IETF). The IETF is an open international community of network designers, operators, vendors, and researchers which develops and promotes voluntary internet standards. I am a co-editor of the IETF’s QUIC transport protocol, and I primarily perform my duties as co-editor from the San Francisco Bay Area.
5. I understand that Jenam Tech LLC (“Jenam”) has sued Google in the Waco Division of the Western District of Texas.
6. If required to testify as a witness in that litigation, it would be far more convenient for me to do so at a courthouse in the Bay Area, which I understand is in the Northern District of California, than in Texas. I would likely be unwilling to testify at a hearing or trial in Texas.

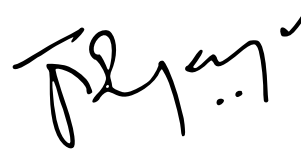
7. To testify at a hearing or trial in Texas, I would have to travel by plane and spend at least one night at a hotel. Accordingly, I would expect to miss additional days of work as compared to testifying at a hearing or trial in the Bay Area. Travel to Texas is further complicated by the fact that my partner and I have two children, and I am responsible for caring for our children during my partner's night shifts as a nurse.

8. Travel also poses additional complications related to Covid-19, as I would be reluctant to travel by plane given personal health and safety concerns, and because of the social distancing precautions that would be required upon my return to the Bay Area.

9. In contrast, to testify at a hearing or trial in the Bay Area, I would not have to travel and be away overnight, could still perform my caregiver role, and would expect to miss fewer days of work.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in Mountain View, California on

August 10, 2020.

A handwritten signature in black ink, appearing to read 'Jana Iyengar', written above a horizontal line.

Jana Iyengar